

# Statement of Basis of the Federal Operating Permit

General Motors LLC

Site Name: General Motors Arlington Assembly Plant

Physical Location: 2525 E Abram St

Nearest City: Arlington

County: Tarrant

Permit Number: 01151

Project Type: Renewal

Standard Industrial Classification (SIC) Code: 3711

SIC Name: Motor Vehicles and Passenger Car Bodies

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

- A description of the facility/area process description;
- A basis for applying permit shields;
- A list of the federal regulatory applicability determinations;
- A table listing the determination of applicable requirements;
- A list of the New Source Review Requirements;
- The rationale for periodic monitoring methods selected;
- The rationale for compliance assurance methods selected;
- A compliance status; and
- A list of available unit attribute forms.

Prepared on: March 13, 2017

## Operating Permit Basis of Determination

### Permit Area Process Description

The General Motors plant assembles newly manufactured automobiles and light trucks. In the body shop, sheet metal components are resistance spot welded, MIG welded, and grinded. Sealers and adhesives may also be used as part of the process and may release small amounts of organic solvents. In the paint shop, the vehicle's surface is washed and coated using miscellaneous solvents and cleaners. This is further classified into the following subdivisions: pre-phosphate washer, Phosphate system, Prime Coat system, ELPO sanding, Primer Surface System, Topcoat System and Deadener/Blackout unit. The painting and coating operations also include baking ovens. VOC's collected during the painting and coating operations are combusted by thermal oxidizers. In general assembly, the vehicle components are assembled and may have emission units from the vehicle fluids fill process, vehicle glass installation, vehicle startup and roll test, and final repair and touchups. Remote or Multiple Location Vehicle Assembly Support Functions include all operations that are integral to vehicle assembly, but cannot be grouped into one physical area. These units include storage tanks, miscellaneous solvents/adhesives, and a maintenance booth. Other facilities include all boilers and equipment that provide building/process heat. These units combust natural gas and provide the heat for paint ovens, oxidizers, hot water heaters, and also the steam necessary to operate certain equipment.

### FOPs at Site

The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

### Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC, PM, NOx, HAPs, CO
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### Reading State of Texas's Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as "applicable requirements") that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
  - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
  - Additional Monitoring Requirements
  - New Source Review Authorization Requirements
  - Compliance Requirements
  - Protection of Stratosphere Ozone
  - Permit Location

- Permit Shield (30 TAC § 122.148)
- Attachments
  - Applicable Requirements Summary
    - Unit Summary
    - Applicable Requirements Summary
  - Additional Monitoring Requirements
  - Permit Shield
  - New Source Review Authorization References
  - Compliance Plan
  - Alternative Requirements
- Appendix A
  - Acronym list

## General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

## Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

## Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the “index number,” detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow

rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

**Permit Shield.** A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

**New Source Review Authorization References.** All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

**Compliance Plan.** A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

**Alternative Requirements.** This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

## Appendix A

**Acronym list.** This attachment lists the common acronyms used when discussing the FOPs.

### **Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions**

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3 for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due

to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

#### **Stationary Vents subject to 30 TAC Chapter 111 not addressed in the Special Terms and Conditions**

All other stationary vents subject to 30 TAC Chapter 111 not covered in the Special Terms and Conditions are listed in the permit's Applicable Requirement Summary. The basis for the applicability determinations for these vents is listed in the Determination of Applicable Requirements table.

#### **Federal Regulatory Applicability Determinations**

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

<b>Regulatory Program</b>	<b>Applicability (Yes/No)</b>
Prevention of Significant Deterioration (PSD)	No
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CSAPR (Cross-State Air Pollution Rule)	No

#### **Basis for Applying Permit Shields**

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

### **Insignificant Activities**

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.
5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
9. Vehicle exhaust from maintenance or repair shops.
10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

## **Determination of Applicable Requirements**

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at [www.tceq.texas.gov/permitting/air/nav/air\\_all\\_ua\\_forms.html](http://www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html).

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at [www.tceq.texas.gov/permitting/air/nav/air\\_supportsys.html](http://www.tceq.texas.gov/permitting/air/nav/air_supportsys.html). The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

## **Operational Flexibility**

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

### Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
PRO-GLASS	40 CFR Part 63, Subpart IIII	63IIII-1	Process Type = Glass bonding system with no more than 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month.	The citations for this rule were determined from the basis of determination provided (i.e. the unit attributes that the applicant should provide when no form exists) and an analysis of the rule text.
PRO-SEALER	40 CFR Part 63, Subpart IIII	63IIII-1	Process Type = Primer-surfacer operation other than materials used as components of glass bonding systems with no more than 0.010 kg/kg (lb/lb) of adhesive and sealer material used during each month.	The citations for this rule were determined from the basis of determination provided (i.e. the unit attributes that the applicant should provide when no form exists) and an analysis of the rule text.
GRP-ENGINE1	30 TAC Chapter 117, Subchapter B	117B-1	Horsepower Rating = Horsepower rating is 50 hp or greater Type of Service = Used exclusively in emergency situations [claiming the emergency service exemption under 30 TAC §§ 117.103(a)(6)(D), 117.203(a)(6)(D), 117.303(a)(6)(D) or 117.403(a)(7)(D)] Fuel Fired = Petroleum-based diesel fuel ESAD Date Placed in Service = Placed into service before March 1, 2009 and has not been modified, reconstructed or relocated on or after March 1, 2009. Diesel HP Rating = Horsepower rating is 100 hp or greater, but less than 750 hp.	
GRP-ENGINE1	40 CFR Part 60, Subpart IIII	60IIII-1	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification on or before July 11, 2005.	
GRP-ENGINE1	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-1	HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2. Brake HP = Stationary RICE with a brake HP greater than or equal to 300 HP and less than or equal to 500 HP. Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002. Service Type = Emergency use where the RICE does not operate or is not contractually obligated to be available for more than 15 hours per calendar year as specified in 40 CFR §63.6640(f)(2)(ii)-(iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii). Stationary RICE Type = Compression ignition engine	
GRP-ENGINE2	30 TAC Chapter 117, Subchapter B	117B-1	Horsepower Rating = Horsepower rating is 50 hp or greater Type of Service = Used exclusively in emergency situations [claiming the emergency service exemption under 30 TAC §§ 117.103(a)(6)(D), 117.203(a)(6)(D), 117.303(a)(6)(D) or 117.403(a)(7)(D)] Fuel Fired = Petroleum-based diesel fuel ESAD Date Placed in Service = Placed into service before March 1, 2009 and has not been modified, reconstructed or relocated on or after March 1, 2009. Diesel HP Rating = Horsepower rating is 100 hp or greater, but less than 750 hp.	



Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRP-ENGINE2	40 CFR Part 60, Subpart IIII	60IIII-1	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification on or before July 11, 2005.	
GRP-ENGINE2	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-1	<p>HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.</p> <p>Brake HP = Stationary RICE with a brake HP greater than or equal to 100 HP and less than 250 HP.</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.</p> <p>Service Type = Emergency use where the RICE does not operate or is not contractually obligated to be available for more than 15 hours per calendar year as specified in 40 CFR §63.6640(f)(2)(ii)-(iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).</p> <p>Stationary RICE Type = Compression ignition engine</p>	
STMPGEN	30 TAC Chapter 117, Subchapter B	117B-1	<p>Horsepower Rating = Horsepower rating is 50 hp or greater</p> <p>Type of Service = Used exclusively in emergency situations [claiming the emergency service exemption under 30 TAC §§ 117.103(a)(6)(D), 117.203(a)(6)(D), 117.303(a)(6)(D) or 117.403(a)(7)(D)]</p> <p>Fuel Fired = Petroleum-based diesel fuel</p> <p>ESAD Date Placed in Service = Installed, modified, reconstructed or relocated on or after March 1, 2009.</p> <p>Diesel HP Rating = Horsepower rating is 100 hp or greater, but less than 750 hp.</p>	
STMPGEN	40 CFR Part 60, Subpart IIII	60IIII-1	<p>Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification after July 11, 2005.</p> <p>Diesel = Diesel fuel is used.</p> <p>Kilowatts = Power rating greater than or equal to 130 KW and less than or equal to 368 KW.</p> <p>Exemptions = The CI ICE is not exempt due to national security, testing at an engine test cell/stand or as a temporary replacement.</p> <p>Displacement = Displacement is less than 10 liters per cylinder and engine is a constant-speed engine.</p> <p>Service = CI ICE is an emergency engine.</p> <p>Standards = The emergency CI ICE does not meet the standards applicable to non-emergency engines.</p> <p>Commencing = CI ICE that is commencing new construction.</p> <p>Compliance Option = The CI ICE and control device is installed, configured, operated, and maintained according to the manufacturer's emission-related written instructions.</p> <p>Manufacture Date = Date of manufacture is after 04/01/2006.</p> <p>Model Year = CI ICE was manufactured in model year 2012.</p>	
STMPGEN	40 CFR Part 63, Subpart ZZZZ	63ZZZZ-1	<p>HAP Source = Any stationary source or group of stationary sources of hazardous air pollutants meeting the definition of a major source as described in 40 CFR § 63.2.</p> <p>Brake HP = Stationary RICE with a brake HP greater than or equal to 300 HP and less than or equal to 500 HP.</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction on or after June</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>12, 2006.</p> <p>Service Type = Emergency use where the RICE does not operate or is not contractually obligated to be available for more than 15 hours per calendar year as specified in 40 CFR §63.6640(f)(2)(ii)-(iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).</p> <p>Stationary RICE Type = Compression ignition engine</p>	
BC-WT3	30 TAC Chapter 115, Storage of VOCs	115B-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>	
BC-WT3	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Waste mixture of indeterminate or variable composition</p> <p>Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters)</p>	
BC-WT4	30 TAC Chapter 115, Storage of VOCs	115B-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>	
BC-WT4	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Waste mixture of indeterminate or variable composition</p> <p>Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters)</p>	
GRP-TANK1	30 TAC Chapter 115, Storage of VOCs	115B-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Product Stored = Gasoline from a storage container in motor vehicle fuel dispensing service (as defined in 30 TAC Chapter 115)</p> <p>Storage Capacity = Capacity is less than 25,000 gallons</p>	
GRP-TANK1	40 CFR Part 60, Subpart K	60K-1	Construction/Modification Date = On or before June 11, 1973	
GRP-TANK2	30 TAC Chapter 115, Storage of VOCs	115B-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Product Stored = Other than crude oil, condensate, or VOC</p>	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRP-TANK2	40 CFR Part 60, Subpart K	60K-1	Construction/Modification Date = On or before June 11, 1973	
TNK-5	30 TAC Chapter 115, Storage of VOCs	115B-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>	
TNK-5	40 CFR Part 60, Subpart K	60K-1	Construction/Modification Date = On or before June 11, 1973	
GRP-DISPENSE	30 TAC Chapter 115, Loading and Unloading of VOC	115C-1	<p>Chapter 115 Facility Type = Motor vehicle fuel dispensing facility</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p>	
GRP-BOILER1	30 TAC Chapter 112, Sulfur Compounds	112A-1	<p>Fuel Type = Liquid fuel.</p> <p>Date of Operation = Began operation before January 1, 1955.</p> <p>Heat Input = Design heat input is less than or equal to 250 MMBtu/hr.</p> <p>FCAA § 412(c) = The unit is not subject to the Federal Clean Air Act § 412(c) [FCAA § 412(c)] as amended in 1990.</p> <p>Stack Height = The effective stack height is at least the standard effective stack height for each stack to which the unit routes emissions.</p>	
GRP-BOILER1	30 TAC Chapter 117, Subchapter B	117B-1	<p>NOx Emission Limitation = Title 30 TAC § 117.410(b).</p> <p>Unit Type = Other industrial, commercial, or institutional boiler.</p> <p>Maximum Rated Capacity = MRC is greater than or equal to 40 MMBtu/hr but less than 100 MMBtu/hr.</p> <p>NOx Monitoring System = Maximum emission rate testing.</p> <p>Fuel Flow Monitoring = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a).</p> <p>CO Emission Limitation = Title 30 TAC § 117.410(d)(1).</p> <p>CO Monitoring System = Monitored by method other than CEMS or PEMS.</p> <p>Fuel Type #1 = Natural gas.</p> <p>NOx Emission Limit Average = Emission limit in pounds/hour on a block one-hour average.</p> <p>NOx Reductions = No NO<sub>x</sub> reduction.</p> <p>Annual Heat Input = Annual heat input is less than or equal to 2.8(10<sup>11</sup>) Btu/yr, based on rolling 12-month average.</p>	
GRP-BOILER1	40 CFR Part 60, Subpart D	60D-1	Construction/Modification Date = On or before August 17, 1971.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
GRP-BOILER1	40 CFR Part 63, Subpart DDDDD	63DDDDD-1	Construction/Reconstruction Date = Construction or reconstruction began on or before June 4, 2010. Heat input capacity = rated heat input capacity of 100 mmbtu/hr or greater Annual capacity factor = no annual capacity factor Fuel type = natural gas	
GRP-STACK1	30 TAC Chapter 111, Visible Emissions	111A-1	Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113. Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit. Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3). Effluent Flow Rate = Effluent flow rate is at least 100,000 actual cubic feet per minute.	
PRO-DEADENER	30 TAC Chapter 115, Subchapter E, Division 5	115E-1	Exemption = No exemption is being met. Specified Process = The surface coating processes or surface coatings specified in § 115.451(i)(1)-(8) are not used. 90% Vapor Control = The process is not using a vapor control system capable of achieving a 90% control efficiency. Alternative Control = No alternative control is being used. Vapor Control = A vapor control device is not used to meet the VOC emission limits. Low Usage = Surface coating operations do not meet any of the above exemptions. Vehicle Assembly = The facility is using one or more of the automotive/light-duty truck assembly surface coatings listed in §115.453(a)(3) Table 2. Process Type = In the Dallas/Fort Worth area, automotive and light-duty truck assembly surface coating process.	
PRO-DEADENER	40 CFR Part 60, Subpart MM	60MM-1	Coating Operations = Coating operations other than guide coat, prime coat and top coat operations are carried out.	
PRO-DEADENER	40 CFR Part 63, Subpart IIII	63IIII-1	Process Type = Deadener materials with no more than 0.010 kg/kg (lb/lb) of deadener material (deadener and thinner) used during each month.	The citations for this rule were determined from the basis of determination provided (i.e. the unit attributes that the applicant should provide when no form exists) and an analysis of the rule text.
PRO-ELPO	30 TAC Chapter 115, Subchapter E, Division 5	115E-1	Exemption = No exemption is being met. Specified Process = The surface coating processes or surface coatings specified in § 115.451(i)(1)-(8) are not used. 90% Vapor Control = The process is using a vapor control system capable of achieving a 90% control efficiency. Alternative Control = No alternative control is being used.	

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
			<p>Capture Efficiency = The facility has an approved protocol for calculating capture efficiency.</p> <p>Low Usage = Surface coating operations do not meet any of the above exemptions.</p> <p>Vehicle Assembly = The facility uses one or more of the processes listed in §115.453(a)(3) Table 1.</p> <p>Electrodeposition = An electrodeposition primer operation is being used.</p> <p>Process Type = In the Dallas/Fort Worth area, automotive and light-duty truck assembly surface coating process.</p>	
PRO-ELPO	40 CFR Part 60, Subpart MM	60MM-1	<p>Coating Operations = Prime coat operations are carried out.</p> <p>Construction/Modification Date = After October 5, 1979.</p> <p>Plastic Parts Coating = The designated facility does not carry out the coating of plastic body components, coating of all-plastic automobile or light-duty truck bodies on separate coating lines.</p> <p>Prime Coat Application = The plant uses electrostatic deposition for applying prime coat operations.</p> <p>Turnover Ratio = 0.04 less than or equal to <math>R_t</math> less than 0.16.</p> <p>Method of Compliance = No capture system and control device is used.</p>	
PRO-ELPO	40 CFR Part 63, Subpart IIII	63IIII-1	<p>Process Type = Coating operation with no more than 0.072 kg/liter (0.60 lb/gal) of coating solids deposited during each month.</p>	The citations for this rule were determined from the basis of determination provided (i.e. the unit attributes that the applicant should provide when no form exists) and an analysis of the rule text.
PRO-FLRP	30 TAC Chapter 115, Subchapter E, Division 5	115E-1	<p>Exemption = No exemption is being met.</p> <p>Specified Process = The surface coating processes or surface coatings specified in § 115.451(i)(1)-(8) are not used.</p> <p>90% Vapor Control = The process is not using a vapor control system capable of achieving a 90% control efficiency.</p> <p>Alternative Control = No alternative control is being used.</p> <p>Vapor Control = A vapor control device is not used to meet the VOC emission limits.</p> <p>Low Usage = Surface coating operations do not meet any of the above exemptions.</p> <p>Vehicle Assembly = The facility uses one or more of the processes listed in §115.453(a)(3) Table 1.</p> <p>Electrodeposition = An electrodeposition primer operation is not being used.</p> <p>Process Type = In the Dallas/Fort Worth area, automotive and light-duty truck assembly surface coating process.</p>	
PRO-FLRP	40 CFR Part 60, Subpart MM	60MM-1	<p>Coating Operations = Coating operations other than guide coat, prime coat and top coat operations are carried out.</p>	
PRO-FLRP	40 CFR Part 63, Subpart IIII	63IIII-1	<p>Process Type = Final repair process with no more than 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month.</p>	The citations for this rule were determined from the basis of determination provided (i.e. the unit attributes that the applicant should provide when no form exists) and an analysis of the

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
				rule text.
PRO-MAINT	30 TAC Chapter 115, Surface Coating Operations	115E-1	<p>Alternate Requirements = No alternate requirement to 30 TAC §§ 115.421(a)(9) or 115.421(b)(8) has been approved or no alternate has been requested.</p> <p>Alternative Compliance Method = No alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria has been approved by the TCEQ Executive Director or no such alternate has been requested.</p> <p>Facility Operations = Other miscellaneous metal parts and products coating.</p> <p>Miscellaneous Coating Type = A coating that is low-bake, or utilizes air or forced air driers.</p> <p>Maintenance Shop = Recoating used miscellaneous metal parts and products at an on-site maintenance shop that began operations before January 1, 2012.</p> <p>VOC Emission Rate = Uncontrolled emission rates not qualifying for exemption from control.</p> <p>Vapor Recovery = No vapor recovery system is used to control emissions.</p>	
PRO-MAINT	40 CFR Part 60, Subpart MM	60MM-1	Coating Operations = Coating operations other than guide coat, prime coat and top coat operations are carried out.	
PRO-PSURF	30 TAC Chapter 115, Subchapter E, Division 5	115E-1	<p>Exemption = No exemption is being met.</p> <p>Specified Process = The surface coating processes or surface coatings specified in § 115.451(i)(1)-(8) are not used.</p> <p>90% Vapor Control = The process is not using a vapor control system capable of achieving a 90% control efficiency.</p> <p>Alternative Control = No alternative control is being used.</p> <p>Vapor Control = A vapor control device is used to meet the VOC emission limits.</p> <p>Capture Efficiency = The facility has an approved protocol for calculating capture efficiency.</p> <p>Low Usage = Surface coating operations do not meet any of the above exemptions.</p> <p>Vehicle Assembly = The facility uses one or more of the processes listed in §115.453(a)(3) Table 1.</p> <p>Electrodeposition = An electrodeposition primer operation is not being used.</p> <p>Process Type = In the Dallas/Fort Worth area, automotive and light-duty truck assembly surface coating process.</p>	
PRO-PSURF	40 CFR Part 60, Subpart MM	60MM-1	<p>Coating Operations = Guide coat operations are carried out.</p> <p>Construction/Modification Date = After October 5, 1979.</p> <p>Plastic Parts Coating = The designated facility does not carry out the coating of plastic body components, coating of all-plastic automobile or light-duty truck bodies on separate coating lines.</p> <p>Method of Compliance = A capture system and a control device is used that destroys VOCs with a thermal incinerator.</p>	
PRO-PSURF	40 CFR Part 63, Subpart IIII	63IIII-1	Process Type = Primer-surfacer operation with no more than 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month.	The citations for this rule were determined from the basis of determination provided (i.e. the unit attributes that the applicant should provide when no form exists) and an analysis of the rule text.

Unit ID	Regulation	Index Number	Basis of Determination*	Changes and Exceptions to DSS**
PRO- TOPCOAT	30 TAC Chapter 115, Subchapter E, Division 5	115E-1	<p>Exemption = No exemption is being met.</p> <p>Specified Process = The surface coating processes or surface coatings specified in § 115.451(i)(1)-(8) are not used.</p> <p>90% Vapor Control = The process is not using a vapor control system capable of achieving a 90% control efficiency.</p> <p>Alternative Control = No alternative control is being used.</p> <p>Vapor Control = A vapor control device is used to meet the VOC emission limits.</p> <p>Capture Efficiency = The facility has an approved protocol for calculating capture efficiency.</p> <p>Low Usage = Surface coating operations do not meet any of the above exemptions.</p> <p>Vehicle Assembly = The facility uses one or more of the processes listed in §115.453(a)(3) Table 1.</p> <p>Electrodeposition = An electrodeposition primer operation is not being used.</p> <p>Process Type = In the Dallas/Fort Worth area, automotive and light-duty truck assembly surface coating process.</p>	
PRO- TOPCOAT	40 CFR Part 60, Subpart MM	60MM-1	<p>Coating Operations = Top coat operations are carried out.</p> <p>Construction/Modification Date = After October 5, 1979.</p> <p>Plastic Parts Coating = The designated facility does not carry out the coating of plastic body components, coating of all-plastic automobile or light-duty truck bodies on separate coating lines.</p> <p>Method of Compliance = A capture system and a control device is used that destroys VOCs with a thermal incinerator.</p>	
PRO- TOPCOAT	40 CFR Part 63, Subpart IIII	63IIII-1	<p>Process Type = Topcoat operation with no more than 0.132 kg/liter (1.10 lb/gal) of coating solids deposited during each month.</p>	The citations for this rule were determined from the basis of determination provided (i.e. the unit attributes that the applicant should provide when no form exists) and an analysis of the rule text.

\* - The "unit attributes" or operating conditions that determine what requirements apply

\*\* - Notes changes made to the automated results from the DSS, and a brief explanation why

### NSR vs. Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference



### New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

[www.tceq.texas.gov/permitting/air/permitbyrule/historical\\_rules/old106list/index106.html](http://www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html)

Outdated Standard Exemption lists may be viewed at the following Web site:

[www.tceq.texas.gov/permitting/air/permitbyrule/historical\\_rules/oldselist/se\\_index.html](http://www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html)

The status of air permits and applications and a link to the Air Permits Remote Document Server is located at the following Web site:

[www.tceq.texas.gov/permitting/air/nav/air\\_status\\_permits.html](http://www.tceq.texas.gov/permitting/air/nav/air_status_permits.html)

<b>Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.</b>	
Authorization No.: 19156	Issuance Date: 06/29/2016
<b>Permits By Rule (30 TAC Chapter 106) for the Application Area</b>	
Number: 106.183	Version No./Date: 06/18/1997
Number: 106.227	Version No./Date: 03/14/1997
Number: 106.242	Version No./Date: 03/14/1997
Number: 106.262	Version No./Date: 09/04/2000
Number: 106.262	Version No./Date: 11/01/2001
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.265	Version No./Date: 03/14/1997
Number: 106.371	Version No./Date: 03/14/1997
Number: 106.373	Version No./Date: 09/04/2000
Number: 106.412	Version No./Date: 09/04/2000
Number: 106.454	Version No./Date: 11/01/2001
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.473	Version No./Date: 09/04/2000
Number: 106.476	Version No./Date: 09/04/2000
Number: 106.492	Version No./Date: 09/04/2000
Number: 106.511	Version No./Date: 03/14/1997
Number: 106.511	Version No./Date: 09/04/2000

Number: 106.512	Version No./Date: 06/13/2001
Number: 106.532	Version No./Date: 09/04/2000
Number: 8	Version No./Date: 09/12/1989
Number: 8	Version No./Date: 04/05/1995
Number: 23	Version No./Date: 05/08/1972
Number: 51	Version No./Date: 03/15/1985
Number: 103	Version No./Date: 09/12/1989
Number: 103	Version No./Date: 06/07/1996

### **Emission Units and Emission Points**

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

### **Monitoring Sufficiency**

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

## Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

### Compliance Assurance Monitoring (CAM):

Compliance Assurance Monitoring (CAM) is a federal monitoring program established under Title 40 Code of Federal Regulations Part 64 (40 CFR Part 64).

Emission units are subject to CAM requirements if they meet the following criteria:

1. the emission unit is subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement;
2. the emission unit uses a control device to achieve compliance with the emission limitation or standard specified in the applicable requirement; and
3. the emission unit has the pre-control device potential to emit greater than or equal to the amount in tons per year for a site to be classified as a major source.

The following table(s) identify the emission unit(s) that are subject to CAM:

Unit/Group/Process Information	
ID No.: PRO-PSURF	
Control Device ID No.: DURR	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Control Device ID No.: REECOJR	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart MM	SOP Index No.: 60MM-1
Pollutant: VOC	Main Standard: § 60.392(b)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: Four times per hour	
Averaging Period: Three hours	
Deviation Limit: Minimum combustion temperature shall not be below 1350 degrees F.	
Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.	

Unit/Group/Process Information	
ID No.: PRO-TOPCOAT	
Control Device ID No.: DURR	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Control Device ID No.: REECOJR	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart MM	SOP Index No.: 60MM-1
Pollutant: VOC	Main Standard: § 60.392(c)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: Four times per hour	
Averaging Period: Three hours	
Deviation Limit: Minimum combustion temperature shall not be below 1350 degrees F.	
<p>Basis of CAM: It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.</p>	

**Periodic Monitoring:**

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information	
ID No.: BC-WT4	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: 115B-1
Pollutant: VOC	Main Standard: § 115.112(e)(1)
Monitoring Information	
Indicator: Structural Integrity of the Pipe	
Minimum Frequency: Emptied and degassed	
Averaging Period: n/a	
Deviation Limit: It shall be considered and reported as a deviation if repairs are not completed prior to refilling the storage vessel.	
<p>Basis of monitoring: The periodic monitoring option provided for emission units using a submerged fill pipe is location of the submerged fill pipe and structural integrity of the pipe. The location and the integrity of the pipe ensure that loading operations are controlled to prevent splash fill and reduce generated vapors; therefore, less emissions are released to the atmosphere. This approach was included as an option by the EPA in the "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources.</p> <p>Keep a record of tank construction specifications.</p>	

<b>Unit/Group/Process Information</b>	
ID No.: BC-WT4	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: 115B-1
Pollutant: VOC	Main Standard: § 115.112(e)(1)
<b>Monitoring Information</b>	
Indicator: Record of Tank Construction Specifications	
Minimum Frequency: n/a	
Averaging Period: n/a	
Deviation Limit: Keep a record of tank construction specifications.	
<p>Basis of monitoring:</p> <p>The periodic monitoring option provided for emission units using a submerged fill pipe is location of the submerged fill pipe and structural integrity of the pipe. The location and the integrity of the pipe ensure that loading operations are controlled to prevent splash fill and reduce generated vapors; therefore, less emissions are released to the atmosphere. This approach was included as an option by the EPA in the "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources.</p>	

Unit/Group/Process Information	
ID No.: GRP-BOILER1	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 112, Sulfur Compounds	SOP Index No.: 112A-1
Pollutant: SO <sub>2</sub>	Main Standard: § 112.9(a)
Monitoring Information	
Indicator: Sulfur Content of Fuel	
Minimum Frequency: Quarterly and within 24 hours of any fuel change	
Averaging Period: n/a*	
Deviation Limit: Distillate oil maximum sulfur concentration shall not exceed 0.3% by weight.	
Basis of monitoring: A common way to determine SO <sub>2</sub> emissions is by determining the amount (percentage) of sulfur in fuel combusted by an emission unit. This quantity along with stack flow rate and quantity of fuel combusted may be used to calculate the amount of SO <sub>2</sub> emitted to the atmosphere.	

\*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

<b>Unit/Group/Process Information</b>	
ID No.: GRP-STACK1	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: 111A-1
Pollutant: PM (OPACITY)	Main Standard: § 111.111(a)(1)(C)
<b>Monitoring Information</b>	
Indicator: Fuel Type	
Minimum Frequency: Annually	
Averaging Period: n/a	
Deviation Limit: If an alternate fuel is fired, either alone or in combination with the specified gas, it shall be considered and reported as a deviation.	
Basis of monitoring: Industry has demonstrated through performance tests and historical data that opacity and particulate matter standards are consistently met when combustion units fire natural gas only.	



<b>Unit/Group/Process Information</b>	
ID No.: TNK-5	
Control Device ID No.: N/A	Control Device Type: N/A
<b>Applicable Regulatory Requirement</b>	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: 115B-1
Pollutant: VOC	Main Standard: § 115.112(e)(1)
<b>Monitoring Information</b>	
Indicator: Structural Integrity of the Pipe	
Minimum Frequency: Emptied and degassed	
Averaging Period: n/a	
Deviation Limit: It shall be considered and reported as a deviation if repairs are not completed prior to refilling the storage vessel.	
Basis of monitoring: The periodic monitoring option provided for emission units using a submerged fill pipe is location of the submerged fill pipe and structural integrity of the pipe. The location and the integrity of the pipe ensure that loading operations are controlled to prevent splash fill and reduce generated vapors; therefore, less emissions are released to the atmosphere. This approach was included as an option by the EPA in the "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources.	

Unit/Group/Process Information	
ID No.: TNK-5	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 115, Storage of VOCs	SOP Index No.: 115B-1
Pollutant: VOC	Main Standard: § 115.112(e)(1)
Monitoring Information	
Indicator: Record of Tank Construction Specifications	
Minimum Frequency: n/a	
Averaging Period: n/a	
Deviation Limit: Keep a record of tank construction specifications.	
<p>Basis of monitoring:</p> <p>The periodic monitoring option provided for emission units using a submerged fill pipe is location of the submerged fill pipe and structural integrity of the pipe. The location and the integrity of the pipe ensure that loading operations are controlled to prevent splash fill and reduce generated vapors; therefore, less emissions are released to the atmosphere. This approach was included as an option by the EPA in the "Periodic Monitoring Technical Reference Document" (April 1999) to monitor VOC sources.</p>	

## Compliance Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on 02/07/2017.

Site rating: 7.24 / Satisfactory Company rating: 7.24 / Satisfactory

(High < 0.10; Satisfactory  $\geq 0.10$  and  $\leq 55$ ; Unsatisfactory > 55)

2. Has the permit changed on the basis of the compliance history or site/company rating? .....No

## Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS? .....No

2. Is a compliance plan and schedule included in the permit? .....No

## Available Unit Attribute Forms

OP-UA1 - Miscellaneous and Generic Unit Attributes

OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes

OP-UA3 - Storage Tank/Vessel Attributes

OP-UA4 - Loading/Unloading Operations Attributes

OP-UA5 - Process Heater/Furnace Attributes

OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes

OP-UA7 - Flare Attributes

OP-UA8 - Coal Preparation Plant Attributes

OP-UA9 - Nonmetallic Mineral Process Plant Attributes

OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes

OP-UA11 - Stationary Turbine Attributes

OP-UA12 - Fugitive Emission Unit Attributes

OP-UA13 - Industrial Process Cooling Tower Attributes

OP-UA14 - Water Separator Attributes

OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes

OP-UA16 - Solvent Degreasing Machine Attributes

OP-UA17 - Distillation Unit Attributes

OP-UA18 - Surface Coating Operations Attributes

OP-UA19 - Wastewater Unit Attributes

OP-UA20 - Asphalt Operations Attributes

OP-UA21 - Grain Elevator Attributes

OP-UA22 - Printing Attributes

OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes

OP-UA25 - Synthetic Fiber Production Attributes

OP-UA26 - Electroplating and Anodizing Unit Attributes

OP-UA27 - Nitric Acid Manufacturing Attributes

OP-UA28 - Polymer Manufacturing Attributes

OP-UA29 - Glass Manufacturing Unit Attributes

OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes

OP-UA31 - Lead Smelting Attributes

OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes

OP-UA33 - Metallic Mineral Processing Plant Attributes

OP-UA34 - Pharmaceutical Manufacturing

OP-UA35 - Incinerator Attributes

OP-UA36 - Steel Plant Unit Attributes

OP-UA37 - Basic Oxygen Process Furnace Unit Attributes

OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes

OP-UA39 - Sterilization Source Attributes

OP-UA40 - Ferroalloy Production Facility Attributes

OP-UA41 - Dry Cleaning Facility Attributes

OP-UA42 - Phosphate Fertilizer Manufacturing Attributes

OP-UA43 - Sulfuric Acid Production Attributes

OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes

OP-UA45 - Surface Impoundment Attributes

OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes

OP-UA47 - Ship Building and Ship Repair Unit Attributes  
OP-UA48 - Air Oxidation Unit Process Attributes  
OP-UA49 - Vacuum-Producing System Attributes  
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes  
OP-UA51 - Dryer/Kiln/Oven Attributes  
OP-UA52 - Closed Vent Systems and Control Devices  
OP-UA53 - Beryllium Processing Attributes  
OP-UA54 - Mercury Chlor-Alkali Cell Attributes  
OP-UA55 - Transfer System Attributes  
OP-UA56 - Vinyl Chloride Process Attributes  
OP-UA57 - Cleaning/Depainting Operation Attributes  
OP-UA58 - Treatment Process Attributes  
OP-UA59 - Coke By-Product Recovery Plant Attributes  
OP-UA60 - Chemical Manufacturing Process Unit Attributes  
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes  
OP-UA62 - Glycol Dehydration Unit Attributes  
OP-UA63 - Vegetable Oil Production Attributes